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INTEROFFICE MEMORANDUM
Longview Fibre Company

DATE: June 13, 1995

FROM: David Mendenhall

TO: Robert Guide

COPIES: RHW TDC RGE ADW ~~SLB~~

SUBJECT: Seattle Box Plant's Annual Environmental Audit

On Wednesday June 7th, I traveled to our Seattle box plant to do an annual inspection for environmental compliance. The plant looks to be in good condition, environmentally, with very few items that need to be addressed. Sonny Bivins the on-site environmental coordinator has done a good job of trying to keep the plant in compliance. Sonny and I took a tour of the plant and spent quite a bit of time looking through their files and the notebook system that he has set up to contain the different records, reports and plans required to comply with the regulations. Sonny put a great deal of time and effort into setting up this system and is to be commended.

Of the items that need to be addressed:

1. Stormwater permit - The plants permit is up the first week of November. Sonny has tried to contact the Department of Ecology but the only response he got was that they are behind and that they hadn't gotten to them yet. As part of the "Clean Water Act Workshop" that I attended on Thursday they gave a presentation on Storm water permits. Peter Birch who is the Storm water group leader at Ecology told me that the new permit applications were sent out the first week of May. When I told him that we had not received any he said we should call the DOE. I did that yesterday and talked with Ed OBrien. He said they would send me the information that I need and that there has been a problem with their mailing lists. He said that

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there would be no problem with sending in the applications late.

Because the Seattle plant is on the Duwamish river and the fact that several groups have been studying the water and sediments in this river I have been having the plant take stormwater samples for the past six months. The purpose of the sampling is to try and establish a baseline data set on what (if anything) is coming out of our plant and into the river.

One of the Best Management Practices (BMP's) in their stormwater permit is to cover all outside dumpsters so that rainfall cannot leach through the garbage and drain into the nearby river via the stormwater system. The plant should investigate the cost of doing this and/or determine if there is another way of keeping this from happening.

2. Hazardous wastes - They are now using the Safety Kleen system for solvents. Sonny sent out a sample of the dirty solvent to have it tested to see if it was indeed hazardous. I told him I would be very surprised if it came back as non-hazardous. He was hoping to get around the haz waste manifesting and filing that has to be done if it is hazardous.
3. Groundwater monitoring - They still have two groundwater monitoring wells on the plant site that are from the original underground tank removal project. These two wells have not been sampled for the past several years and we need to reestablish the fact that they are clean. A P.O. has been written to CH2M Hill in Bellevue to resample these two wells and report the findings to us. This should be done once during June and once during the Fall. When we have this information we will submit it to Ecology and try to get them to close the books on this site for groundwater contamination. Hopefully by the end of this year this will be complete.

There is a large hole in the ground where oil was removed from the groundwater after we had the major leak at the plant in 1990. This hole should be filled in with clean fill as we have removed as much oil as we can from this area and it is a safety hazard.

4. Above ground storage tank - They have a small above ground storage tank that is used for a backup fuel source for the boiler. The plant is going to investigate to see if they really need to keep this tank. It is somewhat of the liability where it sits and they have not used it for five years.

As I said before, the Seattle plant is in pretty good shape, environmentally. They have a few items that need to be addressed.

Branch Plant Environmental Audit Follow-up Report

Based on Audit Dated June 7, 1995

LOCATION **Seattle**

Suggested Action and Area of Interest	Progress Toward Completion of Project		Date Completed
	Date of update	Action Taken	
Need to send in stormwater permit renewal application.	6-19-95	Confirmed w/ Linda that req - form sent to Longview.	
Continue to take stormwater samples through the fall of this year.	6-19-95	Taken & sent	6-19-95
Set up hazardous waste manifest filing system and keep manifests for at least three years.			
Work with CH ₂ M Hill to finish groundwater monitoring sampling and followup report.	6-19-95	Giff Randall -	
Fill the old oil removal well with clean fill.	6-19-95	Set up with Chuck Condit	
Determine if the plant can run economically without having a backup fuel source.			

Please fill out and return within 30 days to: Longview - Environmental Section - Attn: DNM

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